

EXHIBIT F

*Special Counsel for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

V.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC.

Plaintiff.

V

ROGER RECHLER REVOCABLE TRUST,
DENNIS SPRUNG, in his capacity as Trustee of
the ROGER RECHLER REVOCABLE TRUST,
SCOTT RECHLER, GREGG RECHLER, TODD
RECHLER, and EVELYN RECHLER.

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04474 (SMB)

**NOTICE OF MOTION AND MOTION FOR ENTRY OF AN ORDER PURSUANT
TO RULES 15 AND 21 OF THE FEDERAL RULES OF CIVIL PROCEDURE, AS
INCORPORATED BY RULES 7015 AND 7021 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE, GRANTING THE TRUSTEE LEAVE TO FILE AN
AMENDED COMPLAINT AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities, LLC and the estate of Bernard L. Madoff, by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, Courtroom 723, New York, New York 10004, on **July 27, 2016 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, for an order granting the Trustee leave to file an Amended Complaint and For Related Relief in order to (A) re-allege with further specificity his claims for recovery of subsequent transfers against a defendant the claims against whom were previously dismissed without prejudice, and (B) update and conform certain other allegations, in substantially the form and content annexed as Exhibit A to the Declaration being filed simultaneously herewith, as more particularly set forth in the accompanying Memorandum of Law in Support of the Trustee’s Motion for Entry of an Order Pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as Incorporated by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, Granting the Trustee Leave to File an Amended Complaint and For Related Relief.

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Motion must be in writing, conform to the Bankruptcy Rules and other applicable rules and orders of this Court, and shall be filed in accordance with General Order M-399 and the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York (available at www.nysb.uscourts.gov) by no later than **5:00 p.m. on July 20, 2016** (the “Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart

M. Bernstein) and must be served upon (a) Windels Marx Lane & Mittendorf, LLP, 156 West 56th Street, New York, New York 10019, Attn: Howard L. Simon; and (b) Securities Investor Protection Corporation, 1667 K Street, N.W., Suite 1000, Washington, D.C. 20006, Attn: Kevin H. Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis for any objection to the Motion.

Dated: New York, New York
May 31, 2016

By: /s/ Howard L. Simon
Howard L. Simon (hsimon@windelsmarx.com)
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